

SUBMISSION ON PROPOSED TIMARU DISTRICT PLAN

To: Timaru District Council

E-mail: pdp@timdc.govt.nz

Name of Submitter:

- White Water Properties Ltd (White Water)

This is a submission on the following proposed plan:

- The Proposed Timaru District Plan

The submitter could not gain a trade competition advantage through this submission.

The parts of the Proposed Timaru District Plan that the submission relates to are:

- The proposed zoning of land identified in the Proposed District Plan as Future Development Area 13 (FDA 13); and
- Other provisions as set out in Appendix A to this submission.

The submission is:

White Water is the owner of two properties within FDA 13, being 68 SH I, Washdyke Timaru (CB27A/933) and land legally described as Lot 6 DP 4431.

White Water considers that instead of being identified as a Future Development Area in the Proposed District Plan, all the land within FDA13 should be rezoned now as General Industrial Zone. White Water considers that the land is ideally located for industrial development, being contiguous to existing industrial zoning and accessible to primary transport routes, SH 1 included.

White Water considers that a rezoning of the land, subject to an appropriate development plan, would:

- (i) Better give effect to the National Policy Statement on Urban Development 2020.
- (ii) Be consistent with the National Policy Statement for Highly Productive Land 2002 (NPS-HPL) to the extent that the NPS-HPL is relevant, if at all.
- (iii) Give effect to the relevant provisions of the Canterbury Regional Policy Statement.
- (iv) Be more enabling of the social and economic wellbeing of the Timaru District.
- (v) Be the most appropriate outcome under s 32 of the Act; and
- (vi) In contrast to retaining the land as an FDA, better achieve the purpose of the Act.

The following relief is sought:

White Water seeks that the land be rezoned as General Industrial Zone under the Proposed Plan.

In addition, White Water seeks such other amendments to the provisions of the Proposed District Plan as may be necessary to support the rezoning of the land. This may include, but not necessarily be limited to, the requested amendments to the urban growth objectives and policies of the Proposed Plan and supporting rules as set out in Appendix A, together with amendments to the relevant planning maps.

White Water wishes to be heard in support of its submission.

If others make a similar submission, the submitter will consider presenting a joint case with them at a hearing.



Signature of submitter
(or person authorised to sign
on behalf of submitter)

15 December 2022

Date

Address for service of submitters:

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APPENDIX A TO SUBMISSION ON BEHALF OF WHITE WATER PROPERTIES LIMITED

PROVISION	SUPPORT/OPPOSE	COMMENT	RELIEF SOUGHT
Strategic Direction			
SD -06	Support in part	White Water considers it appropriate to have business and economic property identified as a strategic objective. White Water suggests part i of this Objective can be improved by the addition of the words "at least" prior to the words sufficient land. This amendment is considered more appropriate and, amongst others, better reflects the National Policy Statement on Urban Development – NPS UD.	1. Amend SD-06 (i) to read: <i>Business and economic prosperity in the District is enabled in appropriate locations, including by..</i> <i>i. By providing at least sufficient land for a range of business activities to cater for projected growth.</i>
Urban Form and Development			
UFD-01 Settlement Patterns	Oppose in Part	Whitewater opposes the omission of any reference to Future Development Areas in this Objective. FDA's have been specifically identified as appropriate areas for greenfield growth within the District. Notwithstanding the primary relief sought to rezone FDA 13, the Objective should confirm that development within FDA's achieves a consolidated and integrated settlement pattern.	1. Amend UFD-01 to read: <i>A consolidated and integrated settlement patter that:</i> <i>i. efficient accommodates future growth and capacity for commercial, industrial, community and residential activities primarily within the urban areas of the Timaru township, future development areas, and the existing townships of Temuka, Geraldine, and Pleasant Point.</i>

			2. Such other alternative relief that gives effect to the intent of the submission.
Versatile Soil			
VS-P3: Expansion of Urban Areas	Oppose	<p>It should be made specific that this Policy does not apply to identified FDA's, including FDA 13.</p> <p>In addition, urban expansion is now managed by the NPS -HPL which post-dates the notification of the Proposed District Plan.</p>	<ol style="list-style-type: none"> 1. Exempt FDA's from VS- P3; or 2. Delete VS- P3 in its entirety.
Earthworks			
EW- R1 EW- S2	Oppose in part	<p>Bulk earthworks associated with initial engineering works for the development of greenfield land should either be exempt from the 2000m² per site per annum limit, or a more appropriate standard included for such earthworks.</p> <p>In the alternative, controlled activity status should apply to such bulk earthworks.</p>	<ol style="list-style-type: none"> 1. Amend the Earthworks Rules and Standards to give effect to the intent of this submission.
Future Development Area			
FDA-02	Oppose	Without prejudice to the primary relief sought that FDA13 be rezoned, White Water considers that growth within FDA can be enabled prior to rezoning where it can be demonstrated that development does not compromise or constrain the development of the balance of	<ol style="list-style-type: none"> 1. Delete FD-02; or 2. Amend FD-02 to give effect to the intent of this submission.

		the FDA. This is the policy intent of FDA- P1	
FDA -P2 FDA-P5 SCHED15 – Schedule Of Future Development Areas	Oppose	<p>The submitter opposes the sequencing of Future Development Areas for industrial development, FDA 13 included.</p> <p>There are no sound resource management reasons for incorporating a sequencing requirement. In particular, the stated rationale behind sequencing i.e. to avoid adverse effects on urban consolidation is entirely inconsistent with the identification of FDA's on the basis that they represent consolidated development. The Policy implies that development of FDA's will be provided for only when other existing zoned urban areas are fully developed. Applied in practice, this is likely to be disabling of the social and economic wellbeing of the District.</p> <p>Prioritisation of Future Development Areas is also opposed.</p>	<ol style="list-style-type: none"> 1. Delete FDA-P2 and any associated references to sequencing or prioritisation in the Proposed Plan, including within FDA-P5 and Schedule 15; and/or 2. Such other alternative relief as may be appropriate to give effect to the intent of this submission.
FDA- R10 FDA- R12	Oppose	Non-complying activity status for subdivision of FDA land to allotments less than 40ha renders the land incapable of reasonable use and is not justified on the basis of the	<ol style="list-style-type: none"> 1. Amend FDA- R10 and FDA-R12 to make subdivision and industrial activities restricted discretionary activities. Associated matters of

		<p>intent behind the FDA.</p> <p>Non-Complying Activity status for industrial development is similarly inconsistent with the purpose of the industrial FDA's , particular where it can be demonstrated that the industrial activity can</p>	<p>discretion should focus on the effects of the subdivision or industrial activity as well as reflecting and implementing Policy FDA-P13; that is, any development should not compromise the ability to develop the area for urban activities; and/or</p> <p>2. Such other alternative or additional relief as may be appropriate to give effect to the intent of this submission.</p>
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